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RTX CORPORATION

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

STEPHEN PAUL WATSON, Plaintiff, v. DEPARTMENT OF DEFENSE, RTX CORPORATION, UNITED STATES JUSTICE DEPARTMENT, Defendants.	Case No. 2:25-cv-08341-CV-AJR **DEFENDANT RTX CORPORATION'S ANSWER TO PLAINTIFF'S COMPLAINT AND DEMAND FOR JURY TRIAL**

Defendant RTX Corporation ("RTX"), by and through counsel, for its Answer with separate defenses to Plaintiff's Complaint and Request for Injunction ("Complaint"), states as follows:

1. RTX lacks information and knowledge sufficient to form a belief as to the truth of the allegations set forth in Paragraph I(A) and denies these allegations on that basis.

2. RTX admits that its headquarters is located at 1000 Wilson Boulevard, Arlington Virginia. RTX lacks information and knowledge sufficient to form a belief as to the truth of the remaining allegations set forth in Paragraph I(B) and denies these allegations on that basis.

3. The allegations in Paragraph II call for a legal conclusion for which no response is required. To the extent a response is required, RTX denies the allegations.

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4. RTX lacks information and knowledge sufficient to form a belief as to the truth of the allegations set forth in Paragraph III and denies these allegations on that basis.

5. RTX lacks information and knowledge sufficient to form a belief as to the truth of the allegations set forth in Paragraph IV and denies these allegations on that basis.

6. RTX denies that Plaintiff is entitled to any of the relief prayed for Paragraph V.

7. RTX denies each and every allegation in the Complaint that is not specifically admitted in this Answer.

SEPARATE DEFENSES

RTX asserts the following defenses. RTX reserves its right to amend this Answer to assert any other defenses that may become available during the litigation.

1. Plaintiff's complaint fails to state a claim for which relief can be granted.

2. Plaintiff's claims are barred by the applicable statutes of limitation.

3. Plaintiff's claims are barred by the doctrines of laches, waiver, estoppel and/or unclean hands.

4. Any alleged injury or damage claimed by Plaintiff was caused in whole or in part by intervening and/or superseding acts, events, or omissions of persons or entities other than RTX.

5. Plaintiff's claims are barred, in whole or in part, because he has not suffered any injury as a result of the acts alleged in the Complaint.

6. Plaintiff has failed to mitigate his damages.

7. Plaintiff has failed to join necessary parties.

8. At all times relevant, any product manufactured by RTX complied with all applicable federal and/or industry standards, which constitutes the extent of RTX's duties.

9. Plaintiff's claims are barred by his spoliation of evidence.

10. Plaintiff lacks standing to assert the claims for relief alleged Complaint on behalf of his family members.

11. Plaintiff's claims are barred because the damages sought are speculative, remote, and/or impossible to ascertain.

12. Plaintiff's claims are barred by his inability to prove that RTX's actions contributed to his alleged injuries.

WHEREFORE, RTX Corporation, having fully answered the Complaint requests that:

1. The claims against RTX be dismissed with prejudice;
2. Judgment be entered in RTX's favor;
3. RTX be awarded its attorneys' fees, costs, and expenses; and
4. RTX be awarded other such relief to which it is entitled under Federal Rule of Civil Procedure 54(D).

DATED: October 17, 2025

TUCKER ELLIS LLP

By: /s/ *Bart L. Kessel*
Bart L. Kessel
Attorney for Defendant
RTX Corporation

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JURY TRIAL DEMAND

RTX requests trial by jury on all issues so triable.

DATED: October 17, 2025

TUCKER ELLIS LLP

By: /s/ *Bart L. Kessel*
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